

## **EXHIBIT 54**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DOROTHY FORTH, DONNA BAILEY,	:	Civil No. 1:17-cv-02246
LISA BULLARD, RICARDO GONZALES,	:	
CYNTHIA RUSSO, TROY TERMINE,	:	
INTERNATIONAL BROTHERHOOD OF	:	
ELECTRICAL WORKERS LOCAL 38	:	
HEALTH AND WELFARE FUND,	:	
INTERNATIONAL UNION OF	:	
OPERATING ENGINEERS LOCAL 295-	:	
295C WELFARE FUND, AND	:	
STEAMFITTERS FUND LOCAL 439, on	:	
Behalf of Themselves and All Others	:	
Similarly Situated,	:	
	:	
Plaintiffs,		

v.

WALGREEN CO.,

Defendant.

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**DECLARATION OF DARREN K TOWNZEN  
ON BEHALF OF WALMART**

I, Darren K Townzen, declare as follows:

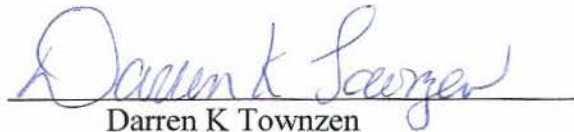
1. I am the Senior Director of Health and Wellness Billing, Reconciliation, and Audit of Walmart Stores, Inc.
2. I have personal knowledge of the facts set forth herein, and if called as a witness to testify thereto, I could competently and truthfully do so.
3. Since approximately 2006, retail pharmacies within Walmart Discount Stores, Walmart Supercenters, and Walmart Neighborhood Market locations in the United States

(“Walmart Retail Pharmacies”) charge \$4 for a 30-day supply, and \$10 for a 90-day supply, of some of the most commonly prescribed generic drugs.<sup>1</sup>

4. The \$4 and \$10 prices Walmart Retail Pharmacies charge for these commonly prescribed generic drugs are the prices that Walmart Retail Pharmacies charge the general public. Customers of Walmart Retail Pharmacies are not required to belong to any discount club or program in order to avail themselves of these prices.

5. Walmart Retail Pharmacies consider the \$4 and \$10 prices for these commonly prescribed generic drugs to be their “usual and customary” prices for such drugs, and accordingly report to payors in NCPDP field 426-DQ the \$4 and \$10 prices for such drugs as the “usual and customary” prices.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Rogers, AR on 4-24-2020

  
Darren K Townzen

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<sup>1</sup> Walmart Retail Pharmacies’ prices for some of these commonly prescribed generic drugs may be higher or vary in some states, including, but not necessarily limited to, California and Minnesota.